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November 27, 2000

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U. S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street, SW, Room PL 401  
Washington DC 20591-0001

Re: FAA Docket No. 28710, Exemption No. 6570B

Ladies and Gentlemen:

In accordance with Federal Aviation Regulations (FAR) Section 11.63, United Air Lines, Inc. (United Airlines or United) hereby petitions the Administrator for an amendment to Exemption No. 6570B and an extension of its expiration date.

Exemption No. 6570B, granted to United Airlines on September 21, 1998, allows an FAA-authorized United Airlines check airman to substitute for the FAA inspector in those cases where an inspector is not available to accomplish the required observation during the scheduled operating experience flight legs of a qualifying PIC who is completing initial or upgrade training [FAR 121.434(c)(1)(ii)]. Exemption No. 6570B terminates on January 31, 2001.

In petitioning for extension of this exemption, United notes that during more than three and a half years during which we have used the provisions of this exemption (original exemption granted January 10, 1997), we have had several occasions when we were able to complete a pilot's initial PIC operating experience (OE) and begin using the services of that PIC, where in the past we would have had to delay OE completion awaiting an FAA inspector. The exemption is meeting its purpose. Moreover, as the FAA implements ATOS with its emphasis on focusing inspector resources on areas of high risk, it is likely that the provisions of Exemption No. 6570B will be used to an even greater degree. Regarding the conditions and limitations of the exemption, our experience and that of the FAA United Airlines Certificate Management Office (CMO) indicate that some modification is in order.

### Proposed Action

Condition No. 2 states: "United must submit to, and have approved by its FAA Principal Operations Inspector (POI) in a letter of approval, the name of each check airman used under this exemption before that check airman performs duties under this exemption."

Our progress into the electronic information age makes Condition No. 2 a bit outdated. The list of approved check airmen and the United submittal and FAA approval processes are now handled through a computer database. Therefore, we request that Condition No. 2 be restated as follows: "United must submit to, and have approved by its FAA Principal Operations Inspector (POI), the name of each check airman used under this exemption before that check airman performs duties under this exemption."

Condition No. 7 states: "No observation may be conducted under this exemption prior to the flight leg during which the qualifying PIC will complete the minimum number of hours specified in section 121.434 (c)(3)."

Our experience with Condition No. 7 convinces us and our POI that it is more restrictive than it needs to be. The purpose of the condition is to "provide the FAA with the greatest possible opportunity to observe the qualifying PIC before the observation is performed by a ...check airman." (Exemption No. 6473) In every case, in accordance with Condition No. 3, United notifies the POI of the need for an FAA observation. When an inspector is not available, that lack of availability almost always pertains to a series of flight legs, any one of which would be satisfactory for an FAA observation. Once the lack of availability is confirmed, check airman scheduling efficiency would be greatly enhanced by the ability to substitute a check airman on a leg near the end of OE, but not necessarily the last leg of OE. Therefore, we request that Condition No. 7 be restated as follows: "No observation may be conducted under this exemption until the flight leg during which the qualifying PIC is to complete at least 80% of the minimum number of hours specified in section 121.434 (c)(3)."

### Public interest

FAR Section 11.71 requires that the petitioner for an exemption explain why the granting of the request would be in the public interest.

This exemption allows United to complete PIC operating experience without the time and expense of scheduling an additional flight leg when an FAA inspector is not available during the normal course of OE. Moreover, some number of days might have to elapse before that additional flight leg could be accomplished, all the while the qualifying PIC would be unavailable for flight duty. It is in the public interest to control costs to the extent possible without adverse impact on flight safety. Experience has now been gained with the use of the provisions of this exemption, and the original FAA conclusion of safety equivalency has been validated. Furthermore, FAA resources can be better used in ATOS

activities and other system safety validation processes, thereby serving the public safety interest.

Waiver of public notice

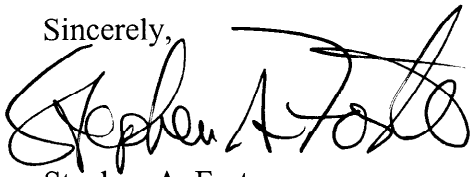
FAR Section 11.87 allows the waiver of public notice of this petition if good cause for such waiver is found. Publication of notice of this petition in the Federal Register would cause unnecessary delay to the petitioner. Granting the relief requested in this petition would not establish a precedent; it simply would broaden the opportunity to use the relief offered in the existing exemption and extend its termination date. Therefore, United suggests that good cause exists to waive publication of notice of this petition.

SUMMARY

United Airlines petitions the Administrator for an amendment to Exemption No. 6570B to broaden the opportunity to use the granted relief and to extend the termination date of the exemption. Exemption No. 6570B allows an FAA-authorized United Airlines check airman to substitute for the FAA inspector in those cases where an inspector is not available to accomplish the required observation during the scheduled operating experience flight legs of a qualifying PIC who is completing initial or upgrade training [FAR 121.434(c)(1)(ii)].

Please advise us if there is any further information you need for your review of this petition. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Forte". The signature is stylized with a large, sweeping initial "S" and a distinct "F".

Stephen A. Forte  
Senior Vice President  
Flight Operations